

SHER TREMONTE LLP

August 6, 2021

VIA ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Moreno-Godoy v. Gallet Dreyer & Berkey LLP, et al.*
Case No. 14 Civ. 7082 (PAE)

Dear Judge Engelmayer:

I write in response to the Court's Order, dated July 30, 2021, directing that *pro bono* district court and appellate counsel confer and advise the Court concerning representation of Mr. Moreno-Godoy at trial. Dkt. # 193. I attach a letter from appellate counsel in response to Your Honor's Order, which I am filing on the docket in advance of appellate counsel being appointed in this Court.

Respectfully submitted,

/s/ Noam Biale
Noam Biale
SHER TREMONTE LLP

cc: Opposing Counsel (via ECF)
John M. Tanksi, esq. (by email)
Craig M. Reiser, esq. (by email)
Luke T. Martin, esq. (by email)

Encl.



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Hon. Paul A. Engelmayer
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Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Moreno Godoy v. Gallet Dreyer & Berkey LLP, et al.*, No. 14 Civ. 7082 (PAE)

Dear Judge Engelmayer:

The United States Court of Appeals for the Second Circuit appointed me to represent Plaintiff Luis Felipe Moreno Godoy in connection with his appeal of the judgment this Court entered on April 11, 2019 in the above matter. (See ECF Nos. 188, 189.) I now write in response to Your Honor's order of July 30, 2021 (ECF No. 193) directing Mr. Moreno Godoy's counsel to confer and advise the Court about representing Mr. Moreno Godoy at trial.

Despite efforts by both my firm and the Sher Tremonte firm, we have been unable to arrange a legal call with Mr. Moreno Godoy prior to the deadline this Court set for responding to its order. We have, however, communicated with Mr. Moreno Godoy in writing and advised him that both law firms are willing to represent him at trial. Mr. Moreno Godoy has advised in writing that he would like Axinn to represent him at trial, and we therefore respectfully request that the Court enter an order appointing Axinn attorneys John Tanski and Craig Reiser, both of whom are admitted to practice before this Court, as *pro bono* counsel for Mr. Moreno Godoy in this matter. We will then promptly enter our appearances in this Court for Mr. Moreno Godoy.

Counsel from Sher Tremonte has agreed to support Axinn's representation of Mr. Moreno Godoy at trial to the extent Mr. Moreno Godoy wishes.

The Court also inquired about trial scheduling. We believe that a trial in the fourth quarter of 2021 or the first quarter of 2022 will be possible for Axinn, subject to the Court's availability and the availability of other counsel and the trial witnesses for both sides.

Respectfully,

A handwritten signature in blue ink that reads "John M. Tanski".

John M. Tanski

CC: All Counsel of Record